

**APPLICATION TO EMPLOY ROSE L. ROMERO OF THE
LAW OFFICES OF ROMERO | KOZUB AS LOCAL COUNSEL
TO RECEIVER EFFECTIVE AS OF DECEMBER 3, 2021**

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the Receivership Order) and receivership estates (collectively, the “Estates”) in the above-captioned case (the “Case”), hereby files this *Application to Employ Rose L. Romero of the Law Offices of Romero | Kozub as Local Counsel to Receiver Effective as of December 3, 2021* (the “Application”), pursuant to this Court’s Order Appointing Receiver [ECF No. 17] (the “Receivership Order”),¹ requesting entry of an order, substantially in the form of the proposed order (the “Proposed Order”) attached hereto as **Exhibit A**, granting approval to employ Rose L. Romero of the Law Offices of Romero | Kozub (“Romero” or the “Firm”) as local counsel to the Receiver in this Case. In support of the Application, the Receiver respectfully represents as follows:

I. Background

1. On December 1, 2021 (the “SEC Application Date”), Plaintiff, the Securities and Exchange Commission (the “SEC”), filed its application for the appointment of a receiver for the Receivership Parties (the “SEC Application”).

2. On December 2, 2021, this Court determined that entry of an order appointing a receiver over the Receivership Parties was both necessary and appropriate to marshal, conserve, hold, and operate all of the Receivership Parties’ assets pending further order of this Court. Accordingly, the Court entered the Receivership Order on December 2, 2021, appointing Deborah D. Williamson as the Receiver over the Estates in this Case.

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Receivership Order.

3. Pursuant to Paragraph 8(H) of the Receivership Order, the Receiver is authorized to employ attorneys as the Receiver deems necessary to perform the Receiver's duties set forth in the Receivership Order. *See* ECF No. 17, at ¶ 8(H). Further, pursuant to Paragraph 60 of the Receivership Order, "the Receiver is authorized to solicit persons and entities ('Retained Personnel') to assist [her] in carrying out the duties and responsibilities described in this Order. The Receiver shall not engage any Retained Personnel without first obtaining an Order of the Court authorizing such engagement." *Id.* at ¶ 60.

II. Relief Requested

4. The Receiver seeks entry of an order authorizing the employment and retention of Romero effective as of December 4, 2021, as local counsel to the Receiver.

5. Romero's representation and assistance may include, without limitation, the following:

- a. Performing all reasonable services and take all such action as may be appropriate and necessary in Romero's and Receiver's professional discretion to further the Receiver's interests.
- b. Any other tasks the Receiver requests that Romero perform.

6. In addition, it is likely that the Receiver and her team will be confronted with and be required to respond to emergencies and other matters that cannot be anticipated at this time. The issues listed above and ancillary issues related thereto are collectively referred to in this Application as the "SEC Receivership Issues."

7. The approval of this Application effective as of December 3, 2021, will not prejudice any parties-in-interest in this Case. The Receiver further submits that the relief requested herein is necessary, appropriate, and in the best interests of the Estates and its parties-in-interest.

III. Romero's Qualifications

8. Romero has been licensed to practice law in the State of Texas since 1987. Romero focuses her practice on white-collar criminal defense, government investigations, SEC regulation and enforcement, and commercial litigation. Romero previously served as the Regional Director for the Fort Worth office of the U.S. Securities and Exchange Commission, where she led the Enforcement and Examination Programs for the Southwestern Region. Romero directed regulatory examinations of investment advisers and broker-dealers and managed enforcement actions involving violations of the Foreign Corrupt Practices Act, insider trading, accounting and corporate reporting violations, and fraud involving investment advisers, hedge funds, and broker-dealers. Prior to her service with the SEC, Romero was an Assistant U.S. Attorney for the Northern District of Texas, where she served in several supervisory roles, including Deputy Criminal Chief and Executive Assistant U.S. Attorney. Romero investigated and prosecuted cases involving all levels of corporate fraud, including financial fraud, money laundering, health care fraud, and mortgage fraud. Romero personally tried more than 60 federal criminal cases to favorable jury verdicts and conducted numerous grand jury investigations and prosecutions in conjunction with the Department of Justice's Criminal Division. Romero has served on special assignments for the Department of Justice, including serving as an advisor and instructor for the Overseas Prosecution Development and Assistance Program in Ecuador, Colombia, Argentina, Brazil, Venezuela, Peru, Honduras, and Mexico. She investigated terrorism cases and frequently appeared before the Foreign Intelligence Surveillance Court. Romero is familiar with SEC receiverships and is located in a geographically optimal area to serve as local counsel. The Receiver believes the most efficient and cost-effective decision is to hire Romero for the specific purpose of representing her as local

counsel. The Receiver believes that employing Romero for these purposes makes business sense and is in the best interest of the Estates.

9. In addition, the Receiver has been informed and believes that, based on the *Declaration of Rose L. Romero in Support of Application to Employ Rose L. Romero of the Law Offices of Romero | Kozub as Local Counsel to Receiver Effective as of December 3, 2021* (the “Romero Declaration”), which is attached hereto as **Exhibit B**, Romero will be working primarily on this Case and is a member in good standing of the State Bar of Texas. Also based on the Romero Declaration—and other than those disclosed in the Romero Declaration—the Receiver is unaware of any conflicts with the Receivership Parties or the Receivership Assets and/or Recoverable Assets.

10. The Receiver also believes that Romero has considerable experience in matters of this character and is well-qualified to represent her in connection with this Case.

IV. Compensation and Reimbursement

11. Subject to this Court’s approval of Romero’s engagement, Romero’s standard hourly rate as of the filing of this Application is \$500 per hour and Diane Kozub’s discounted rate is \$425 per hour.

12. Romero’s invoices will reflect these rates from her standard hourly rate. Romero’s standard rate is subject to periodic adjustment, typically on January 1 of each year. However, as noted above, Romero has agreed not to increase her rate through 2022 in this Case.

13. In addition to the compensation for services rendered, Romero shall be reimbursed for all reasonable out-of-pocket expenses incurred relating directly to work performed for the Receiver in this Case. Examples of such expenses include, but are not limited to, filing fees, travel, photocopies, facsimile copies, postage, overnight or special couriers, long distance telephone calls,

court report costs, deposition fees, and expert witness fees. Romero charges only the amount actually incurred by it in connection with such items.²

14. To ensure compliance with all applicable deadlines and exigencies in this Case, Romero will from time to time utilize the services of overtime secretarial or legal assistants and may seek reimbursement for the same. Romero does not charge for secretarial or word-processing expenses incurred during the normal working day.

15. Romero shall seek approval for compensation of its fees and expenses on an interim and final basis in accordance with the Court's Receivership Order, the local rules of this Court, the Billing Instructions, and other applicable orders of the Court. Romero will keep contemporaneous time records on a daily basis and track its billings on a tenth-of-an-hour basis with time charges allocated accordingly.

V. Romero's Disinterestedness

16. In support of the Application, the Receiver submits the Romero Declaration. The Romero Declaration includes results from the computerized conflicts search run by, which includes narratives explaining any connection between Romero and the SEC, Receivership Parties, the Estates, and any other significant parties-in-interest in this Case. Except as set forth below or in the Romero Declaration, to the best of the Receiver's knowledge, Romero has no current connection with the SEC, the Receivership Parties, the Estates, or any other significant parties-in-interest in this Case, and Romero does not represent any interest adverse to the SEC, Receivership

² The Firm does not charge for de minimis duplication, printing, and scanning. The Firm does not charge its clients for outgoing or incoming facsimile transmissions. The Firm has a negotiated rate for Westlaw computer-assisted legal research on certain covered databases. Research not covered by the Firm's agreement with Westlaw is billed at full rates and passed through accordingly. Computer-assisted legal research is used whenever the researcher determines that using Westlaw is more cost-effective than using traditional research techniques.

Parties, the Estates, or any other significant parties-in-interest in this Case on the matters to which Romero is being retained. Likewise, except as set forth below or in the Romero Declaration, Romero does not represent any interest materially adverse to the SEC, Receivership Parties, the Estates, or any other significant parties-in-interest in this Case.

17. In addition, as detailed in the Romero Declaration, Romero has informed the Receiver that she may have and may continue to provide legal advice to or have relationship with parties other than the Receiver. Romero has also informed the Receiver that, except as set forth below or in the Romero Declaration, she is not presently representing any party in this Case or with interests that conflict with those of the Receiver. However, given her practice and client base, Romero may represent clients in matters unrelated to this Case who are or become parties in interest to this Case.

18. In addition, as of the SEC Application Date, Romero was not owed any money for legal services rendered to or expenses paid on behalf of the Receiver in this Case.

19. Romero has neither shared nor agreed to share with any other person compensation received or to be received in this Case.

20. To the best of the Receiver's knowledge, and except as disclosed in the Romero Declaration, Romero does not hold or represent any other interest adverse to the Estates. The Receiver believes that Romero is a disinterested person qualified to represent the Receiver in this Case. The Receiver submits that Romero's employment in this Case would be in the best interests of the Estates and the parties-in-interest thereof.

VI. Notice


21. Notice of this Application has been provided to: (a) counsel to the SEC; (b) counsel to the Receivership Parties, if known; and (c) those persons who have formally appeared and

requested notice in this Case, as applicable. The Receiver submits that no other or further notice need be provided.

WHEREFORE, the Receiver respectfully requests that this Court enter the Proposed Order (a) authorizing the employment of Romero as local counsel for the Receiver in this Case effective as of December 3, 2021; (b) authorizing Romero to be compensated as set forth herein; and (c) awarding the Receiver such other and further relief that this Court deems just and proper.

Dated: December 6, 2021

Respectfully submitted,

By: 
Deborah D. Williamson
(Receiver)
State Bar No. 21617500
dwilliamson@dykema.com
DYKEMA GOSSETT PLLC
112 East Pecan Street, Suite 1800
San Antonio, Texas 78205
Telephone: (210) 554-5500
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and

Rose L. Romero
State Bar No. 17224700
Rose.Romero@RomeroKozub.com
**LAW OFFICES OF
ROMERO | KOZUB**
235 N.E. Loop 820, Suite 310
Hurst, Texas 76053
Telephone: (682) 267-1351

**PROPOSED LOCAL COUNSEL
TO RECEIVER**

CERTIFICATE OF CONFERENCE

I hereby certify that on December 3, 2021, I conferred with Plaintiff Securities and Exchange Commission (the “SEC”) as to the terms and conditions of the employment of Law Practice of Darrell R. Romero as set forth in the foregoing motion. The SEC is not opposed to the relief sought in this motion.

Deborah D. Williamson
Deborah D. Williamson
Receiver

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2021, the foregoing motion and corresponding exhibits were served via CM/ECF and via email on counsel for Plaintiff Securities and Exchange Commission.

/s/ Danielle N. Rushing
Danielle N. Rushing

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

THE HEARTLAND GROUP VENTURES, LLC;
HEARTLAND PRODUCTION AND RECOVERY
LLC; HEARTLAND PRODUCTION AND
RECOVERY FUND LLC; HEARTLAND
PRODUCTION AND RECOVERY FUND II LLC;
THE HEARTLAND GROUP FUND III, LLC;
HEARTLAND DRILLING FUND I, LP; CARSON
OIL FIELD DEVELOPMENT FUND II, LP;
ALTERNATIVE OFFICE SOLUTIONS, LLC;
ARCOIL CORP[.]; BARRON PETROLEUM
LLC; DODSON PRAIRIE OIL & GAS LLC;
PANTHER CITY ENERGY LLC; and
ENCYIPHER BASTION, LLC

Defendants,

and

IGROUP ENTERPRISES LLC; MURATORE
FINANCIAL SERVICES, INC.; BARRON
ENERGY CORPORATION; DALLAS
RESOURCES INC[.]; LEADING EDGE
ENERGY, LLC; SAHOTA CAPITAL LLC; and
1178137 BC LTD,

Relief Defendants.

Civil No. _____

**ORDER APPROVING EMPLOYMENT OF ROSE L. ROMERO OF THE
LAW OFFICES OF ROMERO | KOZUB AS LOCAL COUNSEL
TO RECEIVER EFFECTIVE AS OF DECEMBER 3, 2021**

Before the Court is the *Application to Employ Rose L. Romero of the Law Offices of Romero | Kozub as Local Counsel to Receiver Effective December 3, 2021* (the “Application”),¹ filed by Deborah D. Williamson, Court-appointed Receiver in the Case, pursuant to the Court’s Order Appointing Receiver, entered on December 2, 2021, in this Case; the Court finds that: (i) it has subject matter jurisdiction over the Application; (ii) it has personal jurisdiction over the Receivership Parties; (iii) the Law Offices of Romero | Kozub (“Romero”) (a) does not represent or hold any interest adverse to the Receivership Parties or the Estates and (b) is disinterested and not otherwise disqualified from representing the Receiver; (iv) the Receiver’s employment of Romero under the scope outlined in the Application is in the best interests of the Estates; (v) proper and adequate notice of the Application has been given and that no other or further notice is necessary; (vi) no objections to the Application were filed with this Court; (vii) (a) the Receiver engaged Romero on December 3, 2021, and (b) the employment of Romero should be effective as of that date; and (viii) the Receiver has shown good, sufficient, and sound business purpose and justification for the relief requested in the Application, and that, after due deliberation thereon, good and sufficient cause exists for approving the relief requested therein; accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is **APPROVED**.

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Application.

2. Pursuant to the Receivership Order, the Receiver is authorized to employ and retain Romero as local counsel in accordance with the compensation terms detailed in the Application effective as of December 3, 2021.

3. Romero is authorized to provide such professional services in this Case and assist the Receiver in relation to the SEC Receivership Issues outlined in the Application, including, without limitation, any issues ancillary and related thereto.

4. Romero shall cause to be filed, through the Receiver, applications for the approval of compensation of her fees and expenses on an interim and final basis in compliance with the Court's Receivership Order, the local rules of this Court, and such other procedures that may be fixed by an order of this Court.

SO ORDERED.

[_____], 2021.

REED O'CONNOR
UNITED STATES DISTRICT JUDGE

Prepared and submitted by:

Deborah D. Williamson

(Receiver)

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COUNSEL TO RECEIVER

EXHIBIT B

DECLARATION OF ROSE L. ROMERO IN SUPPORT OF APPLICATION TO EMPLOY ROSE L. ROMERO OF THE LAW OFFICES OF ROMERO | KOZUB AS LOCAL COUNSEL TO RECEIVER EFFECTIVE AS OF DECEMBER 3, 2021

I, Rose L. Romero, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

1. I am over the age of eighteen, and I am in all respects competent to make this Declaration¹ in support of the Receiver's *Application to Employ Rose L. Romero of the Law Offices of Romero | Kozub as Local Counsel to Receiver Effective as of December 3, 2021* (the "Application"), which is filed concurrently with this Declaration. Unless otherwise stated, I have personal knowledge of all facts set forth in this Declaration, and they are true and correct.

2. I am an attorney at the Law Offices of Romero | Kozub ("Romero"), officing in Hurst, Texas. I am a member in good standing of the State Bar of Texas. There are no disciplinary proceedings pending against me.

3. I have experience in a variety of practice areas and expertise in white collar defense, government investigation, SEC regulation and enforcement, and commercial litigation. I am well qualified to act as local counsel for the Receiver in the above-captioned case focusing on operations, dispositions, and other issues related to oil and gas assets of the Estates (the "Case").

I. Services to be Provided

4. The Receiver seeks entry of the Proposed Order authorizing the employment and retention of me as of December 3, 2021, as local counsel to the Receiver to handle all reasonable services and take all such action as may be appropriate and necessary in Receiver's and my own

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Application.

professional discretion related to the Receivership Parties' Estates. Such representation and assistance may include, without limitation, the following:

- a. Performing all reasonable services and take all such action as may be appropriate and necessary in Romero's and Receiver's professional discretion to further the Receiver's interests.
- b. Any other tasks the Receiver requests that I perform.

5. In addition, it is likely that the Receiver and her team will be confronted with and be required to respond to emergencies and other matters that cannot be anticipated at this time.

II. General Disclosures

6. I am required to disclose to this Court any and all connections with the SEC, Receivership Parties, the Estates, and any other significant parties-in-interest in this Case.

7. I may have in the past represented, may currently represent, and likely in the future may represent parties-in-interest of the SEC, Receivership Parties, the Estates, or any other significant parties-in-interest in this Case. I have conducted a search of my client database to ascertain my connections with parties-in-interest in this Case and to ensure that I am in compliance with the Court's Receivership Order and the local rules of this Court.

8. I have undertaken a detailed review of my files to determine my connections and to make the disclosure contained herein. Due to the unknown number and identity of parties-in-interest in this Case as a result of the early stage of the Receiver's investigation, I am currently unable to completely and accurately reflect every possible connection between myself, Romero | Kozub, and all potential parties-in-interest. I will continue the review of my files, and, if any additional connections are discovered, I will supplement this Declaration to disclose any supplemental connections not disclosed at this time.

9. Insofar as I have been able to ascertain, I do not have any current connection with the SEC, Receivership Parties, the Estates, or any other significant parties-in-interest in this Case, or the respective attorneys, accountants, agents, and affiliates of the foregoing, except as may otherwise be set forth, qualified, and disclosed in this Declaration.

10. I do not hold or represent any interest adverse to the SEC, Receivership Parties, the Estates, or any other significant parties-in-interest in this Case in connection with matters upon which I am to be engaged. I am not aware of any claims that I hold or would hold against the Estates. To the extent that I become aware of any additional relationships that may be relevant prior to the Court's determination of the Application, I will promptly file a supplemental declaration disclosing such information.

11. I will not represent any person or entity in a transaction with the Estates that may conflict with my representation of the Receiver in this Case.

III. Specific Disclosures

12. I may represent or hold connections with certain parties-in-interest to this Case in connection with ongoing matters unrelated to the SEC, Receivership Parties, and the Estates. No such representation is materially adverse to the interests of the Estates or any parties-in-interest thereof. I am not disqualified from acting as the Receiver's local counsel merely because I may represent certain parties-in-interest in matters unrelated to this Case.

13. I am not aware of any connections. The Receiver will obtain independent counsel to address any issues that may arise in the future among the Receiver, on the one hand, and other Romero clients, on the other hand. If a dispute develops between the Receiver and any current client, then I will not be involved in said dispute.

IV. Professional Compensation During the Case

14. I shall seek, through the Receiver, approval for compensation of my fees and expenses on an interim and final basis in accordance with the Court's Receivership Order, the local rules of this Court, the Billing Instructions of the SEC, and any other applicable orders of this Court. I will keep contemporaneous time records on a daily basis and track my billings on a tenth-of-an-hour basis with time charges allocated accordingly.

15. Subject to this Court's approval of my engagement, the Receiver proposes to compensate me at my standard hourly rate as of the filing of this Application which is \$500 per hour and my colleague, Diana Kozub's proposed discounted rate of \$425 per hour.

16. My invoices will reflect my standard hourly rate. My standard rate is subject to periodic adjustment, typically on January 1 of each year. However, as noted above, I agreed not to increase my rate through 2022 in this Case.

22. In addition to the compensation for services rendered, I shall be reimbursed for all reasonable out-of-pocket expenses incurred relating directly to work performed for the Receiver in this Case. Examples of such expenses include, but are not limited to, filing fees, travel, photocopies, facsimile copies, postage, overnight or special couriers, long distance telephone calls, court report costs, deposition fees, and expert witness fees. Romero charges only the amount actually incurred by it in connection with such items.²

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17. To ensure compliance with all applicable deadlines and exigencies in this Case, I may from time to time utilize the services of overtime secretarial and legal assistants and may seek reimbursement for the same. I do not charge for secretarial or word-processing expenses incurred during the normal working day.

18. I have not shared and agree not to share (a) any compensation I have received or may receive with another party or person, or (b) any compensation another person or party has received or may receive.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 6, 2021

/s/ Rose L. Romero
ROSE L. ROMERO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

THE HEARTLAND GROUP VENTURES, LLC;
HEARTLAND PRODUCTION AND RECOVERY
LLC; HEARTLAND PRODUCTION AND
RECOVERY FUND LLC; HEARTLAND
PRODUCTION AND RECOVERY FUND II LLC;
THE HEARTLAND GROUP FUND III, LLC;
HEARTLAND DRILLING FUND I, LP; CARSON
OIL FIELD DEVELOPMENT FUND II, LP;
ALTERNATIVE OFFICE SOLUTIONS, LLC;
ARCOIL CORP[.]; BARRON PETROLEUM
LLC; DODSON PRAIRIE OIL & GAS LLC;
PANTHER CITY ENERGY LLC; and
ENCYIPHER BASTION, LLC

Civil No. _____

Defendants,

and

IGROUP ENTERPRISES LLC; MURATORE
FINANCIAL SERVICES, INC.; BARRON
ENERGY CORPORATION; DALLAS
RESOURCES INC[.]; LEADING EDGE
ENERGY, LLC; SAHOTA CAPITAL LLC; and
1178137 BC LTD,

Relief Defendants.

**ORDER APPROVING EMPLOYMENT OF ROSE L. ROMERO OF THE
LAW OFFICES OF ROMERO | KOZUB AS LOCAL COUNSEL
TO RECEIVER EFFECTIVE AS OF DECEMBER 3, 2021**

Before the Court is the *Application to Employ Rose L. Romero of the Law Offices of Romero | Kozub as Local Counsel to Receiver Effective December 3, 2021* (the “Application”),¹ filed by Deborah D. Williamson, Court-appointed Receiver in the Case, pursuant to the Court’s Order Appointing Receiver, entered on December 2, 2021, in this Case; the Court finds that: (i) it has subject matter jurisdiction over the Application; (ii) it has personal jurisdiction over the Receivership Parties; (iii) the Law Offices of Romero | Kozub (“Romero”) (a) does not represent or hold any interest adverse to the Receivership Parties or the Estates and (b) is disinterested and not otherwise disqualified from representing the Receiver; (iv) the Receiver’s employment of Romero under the scope outlined in the Application is in the best interests of the Estates; (v) proper and adequate notice of the Application has been given and that no other or further notice is necessary; (vi) no objections to the Application were filed with this Court; (vii) (a) the Receiver engaged Romero on December 3, 2021, and (b) the employment of Romero should be effective as of that date; and (viii) the Receiver has shown good, sufficient, and sound business purpose and justification for the relief requested in the Application, and that, after due deliberation thereon, good and sufficient cause exists for approving the relief requested therein; accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is **APPROVED**.

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Application.

2. Pursuant to the Receivership Order, the Receiver is authorized to employ and retain Romero as local counsel in accordance with the compensation terms detailed in the Application effective as of December 3, 2021.

3. Romero is authorized to provide such professional services in this Case and assist the Receiver in relation to the SEC Receivership Issues outlined in the Application, including, without limitation, any issues ancillary and related thereto.

4. Romero shall cause to be filed, through the Receiver, applications for the approval of compensation of her fees and expenses on an interim and final basis in compliance with the Court's Receivership Order, the local rules of this Court, and such other procedures that may be fixed by an order of this Court.

SO ORDERED.

[_____] , 2021.

REED O'CONNOR
UNITED STATES DISTRICT JUDGE

Prepared and submitted by:

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COUNSEL TO RECEIVER